

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:

9/16/2019

Completion date for Phase I Discovery as agreed upon by the parties:
(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)

11/4/2019

Date for initial settlement conference:
(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)

[to be discussed with Court at Initial Conference]

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post initial settlement conference)

11/27/2019

First requests for production of documents and for interrogatories due by:
(Presumptively 15 days post joining/amending)

12/12/2019

All fact discovery completed by:
(Presumptively 3.5 months post first requests for documents/interrogatories)

3/19/2020

Exchange of expert reports completed by:
(Presumptively 30 days post fact discovery)

4/17/2020

Expert depositions completed by:
(Presumptively 30 days post expert reports)

5/18/2020

COMPLETION OF ALL DISCOVERY BY:
(Presumptively 9 months after Initial Conference)

5/22/2020

Final date to take first step in dispositive motion practice:
(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)

6/22/2020

Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?

No